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*Counsel for Certain Plaintiffs,  
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UNITED STATES BANKRUPTCY COURT  
SOUTHERN DISTRICT OF NEW YORK

-----X	
In re	: Chapter 11
	:
MOTORS LIQUIDATION CORP.,	: Case No. 09-50026 (REG)
	:
Debtor.	:
-----X	

**NOTICE OF APPEARANCE AND REQUEST FOR SERVICE OF PAPERS**

**PLEASE TAKE NOTICE** that, pursuant to Rule 9010(b) of the Federal Rules of Bankruptcy Procedure (the “**Bankruptcy Rules**”) and section 1109(b) of title 11 of the United States Code, 11 U.S.C. §§ 101, et seq., the undersigned hereby appear in the above-captioned cases as counsel for Tammie Balls, Jeffrey Balls, Sara Robinson, John Helcl, Richard Lewis, Denise Peterson, Lianne LaReine, Marguerite Chandler, James Evans, Lea Jordanides, Bonita LaGoe and Yvonne E. Rodriguez, individually and as putative class representatives in certain pending actions, and, pursuant to Bankruptcy Rules 2002, 3017(a) and 9007, hereby request that all notices given or required to be given and all papers and pleadings served or required to be served in these cases (including, but not limited to, all papers filed and served in all adversary proceedings in these cases), whether sent by the Clerk of the Court, the Debtors or their successors, or any creditor, committee, or party in interest, be given to and served upon the persons set forth below, and that such names and addresses be added to any master mailing list:

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**PLEASE TAKE FURTHER NOTICE** that this request includes not only the notices, papers and pleadings referenced in the above-referenced Bankruptcy Rules, but also includes, without limitation, orders on and notices of any motion, application, petition, pleading, request, complaint, or demand, whether formal or informal, written or oral, transmitted or conveyed by mail, hand delivery, telephone, facsimile, electronic mail, or otherwise in these cases.

**PLEASE TAKE FURTHER NOTICE** that neither this request for notice nor any subsequent appearance, pleading, claim, suit or other writing or conduct shall constitute a waiver of any: (a) rights to have any and all final orders in any and all non-core matters entered only after *de novo* review by a United States District Court; (b) rights to trial by jury in any proceeding as to any and all matters so triable; (c) rights to have the reference withdrawn by the United States District Court in any matter or proceeding subject to mandatory or discretionary withdrawal; and (d) other rights, claims, actions, defenses, setoffs, recoupments, or other matters

under any agreement, in law or in equity. All of such rights hereby are reserved and preserved without exception and with no purpose of confessing or conceding jurisdiction in any way by this filing or by any other participation in these cases.

Dated: April 23, 2014

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